

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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MICHELLE BEEBE,

Plaintiff,

v.

WILLIAMS COLLEGE,

Defendant.

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Civil Action No. 05-30182

**MOTION TO COMPEL**

Pursuant to Fed. R. Civ. P. 35 and 37, Defendant Williams College (the “College”) respectfully moves the Court for an Order directing Plaintiff Michelle Beebe (“Plaintiff”) to appear at a mutually agreeable time and place, for the purpose of being interviewed by Defendant’s employability expert, Steve Miller, President of The Miller Group, concerning the mitigation of damages sought by Plaintiff in this action. Alternatively, Defendant seeks an Order directing Plaintiff to appear at a mutually agreeable time and place, for the purpose of being deposed in the presence of Mr. Miller, concerning the mitigation of damages sought by Plaintiff in this action. Williams also requests that the time for completing the experts report be extended until May 15, 2007.

For the reasons stated in the accompanying memorandum and its exhibits, the College respectfully requests that this Court grant its Motion. The College further requests a hearing on its Motion.

Respectfully submitted,  
Williams College  
By its attorneys,

/s/ Judith A. Malone

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Dated: April 17, 2007

CERTIFICATE OF SERVICE

I hereby certify that this document has been filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Judith A. Malone